

3. Federal Rule of Civil Procedure 15(a) provides that: *“a party may amend its pleading only with ... the court’s leave. The court should freely give leave when justice so requires.”*

4. Plaintiff’s Proposed First Amended Complaint is submitted as an exhibit hereto.

WHEREFORE, Plaintiff respectfully requests that the court:

A. Grant this Motion for Leave to File an Amended Complaint;

B. Grant such other relief as is equitable and just.

Due to the nature of this Motion, no concurrence has been sought.

Due to the nature of this Motion, no memorandum is required.

As noted above, Plaintiff’s Proposed First Amended Complaint is submitted as an exhibit hereto.

Dated: January 11, 2011

/s/Arthur Ginsberg
Arthur Ginsberg
10 Glendale Drive
Nashua, New Hampshire 03064
603-889-0393
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was personally served on all parties of record via ECF:

Dated: January 11, 2011

/s/Arthur Ginsberg
Arthur Ginsberg